



November 25, 2024

VIA ECF

The Honorable Victoria Reznik, USMJ
United States District Court
for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: *Galvan v. Rolling Lawns, Inc. et al.*, Case No. 7:23-cv-06724(CS)(VR)

Dear Judge Reznik:

We represent Plaintiff Nepamuceno Galvan in the above-captioned action, and, together with counsel for Defendants, respectfully submit this letter in accordance with Your Honor's November 18, 2024 Order.

The parties have met and conferred, and have agreed upon the following search additional terms for Defendants' ESI searches:

Injur!
Hurt
Pain!
Compl!
Hospital
Doctor
Medic!
Fell
Fall
Ladder
Foot
Ankle
Worker! /5 comp!
Disab!
STD
FMLA
Terminat!
Fire
Fire!
Separat!

Age
edad
old
viejo

We are available at the Court's convenience to discuss.

Respectfully submitted,

KALMANSON COHEN, PLLC

/s/ Kimberly Kalmanson

By: Kimberly Kalmanson

MOSER LAW FIRM, P.C.

/s/ Steven J. Moser

By: Steven J. Moser